

April 29, 2019

Via Electronic Filing

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: Notice of Ex-Parte Presentation - CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On April 25, 2019, Joseph Duarte, Co-CEO of InnoCaption, and Cristina Duarte, Director of Regulatory Affairs for InnoCaption ("InnoCaption Team")¹, met with Michael Carowitz, Special Counsel for Chairman Pai, and Randy Clarke, Acting Legal Advisor for Commissioner Starks. On April 29, 2019, the InnoCaption Team met with Arielle Roth, Legal Advisor for Commissioner O'Rielly; Jamie Susskind, Chief of Staff for Commissioner Carr; Patrick Webre, Robert Aldrich, Eliot Greenwald, and Michael Scott of the Consumer and Governmental Affairs Bureau (CGB); and David Schmidt of the Office of Managing Director (OMD).

The purpose of the meetings was to discuss the financial impact the upcoming IP-CTS rate cuts will have on the Company.² InnoCaption encouraged the Commission to issue an industry-wide rate freeze until a more permanent rate methodology is implemented. In the event the Commission does not find it appropriate to issue an industry-wide rate freeze, InnoCaption requested an emergency rate freeze for itself, as the smallest provider, to ensure the Company's short-term financial viability.

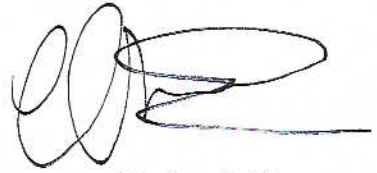
This notice is filed in accordance with Section 1.1206(b) of the Commission's rules.³

¹ Please note, Paul Lee from the InnoCaption Team was also in attendance via telephone for the meeting with Michael Carowitz on April 25, 2019, and for the meeting with CGB and OMD on April 29, 2019.

² *Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing Loss and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79 (June 8, 2018) ("Order")

³ 47 C.F.R. § 1.1206(b).

Respectfully Submitted,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

CC: Arielle Roth
Jamie Susskind
Michael Carowitz
Randy Clarke
Patrick Webre
Eliot Greenwald
Robert Aldrich
Michael Scott
David Schmidt



Business Progress Update

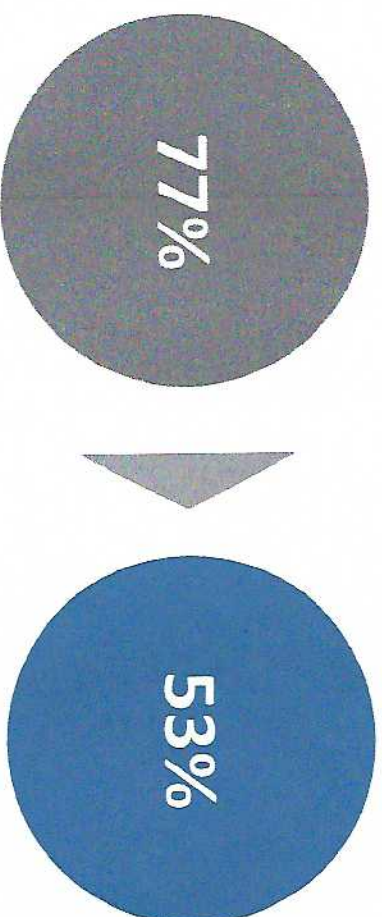
April 25, 2019

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InnoCaption's Purpose

In an increasingly mobile-centric world, InnoCaption provides the deaf and hard of hearing community with the only complete mobile app-based IP-CTS communication solution

With increasing smartphone penetration, most US households no longer have a landline phone



Examples of situations where our users need mobile voice communications

- Receive a client call for work
- Make an outbound call to a colleague
- Participate in phone interviews
- Call doctor's office
- Dial 911 emergency
- Receive call from child's school
- Book or confirm restaurant reservation
- Call family and friends on the go


1. Pew Research Center as of 2018; National Center for Health Statistics as of 2017
Confidential

Driving Innovation


InnoCaption has been at the forefront of innovation within the IP-CTS industry with its mobile communication offering, a service that other providers have been slow to bring to market

Captioned call service offering for each IP-CTS provider


 **InnoCaption**



Fully supports Android and iOS devices

 **CaptionCall**
Live Captioning

Limited 

Only on WiFi connected iPads (cellular data incompatible)


 



 **HAMILTON**
capital

Limited 



Legacy Android app only (no support for new devices)


 



 **ClearCaptions**



 

iOS app only recently launched in March 2019

 **Sprint**
Capital

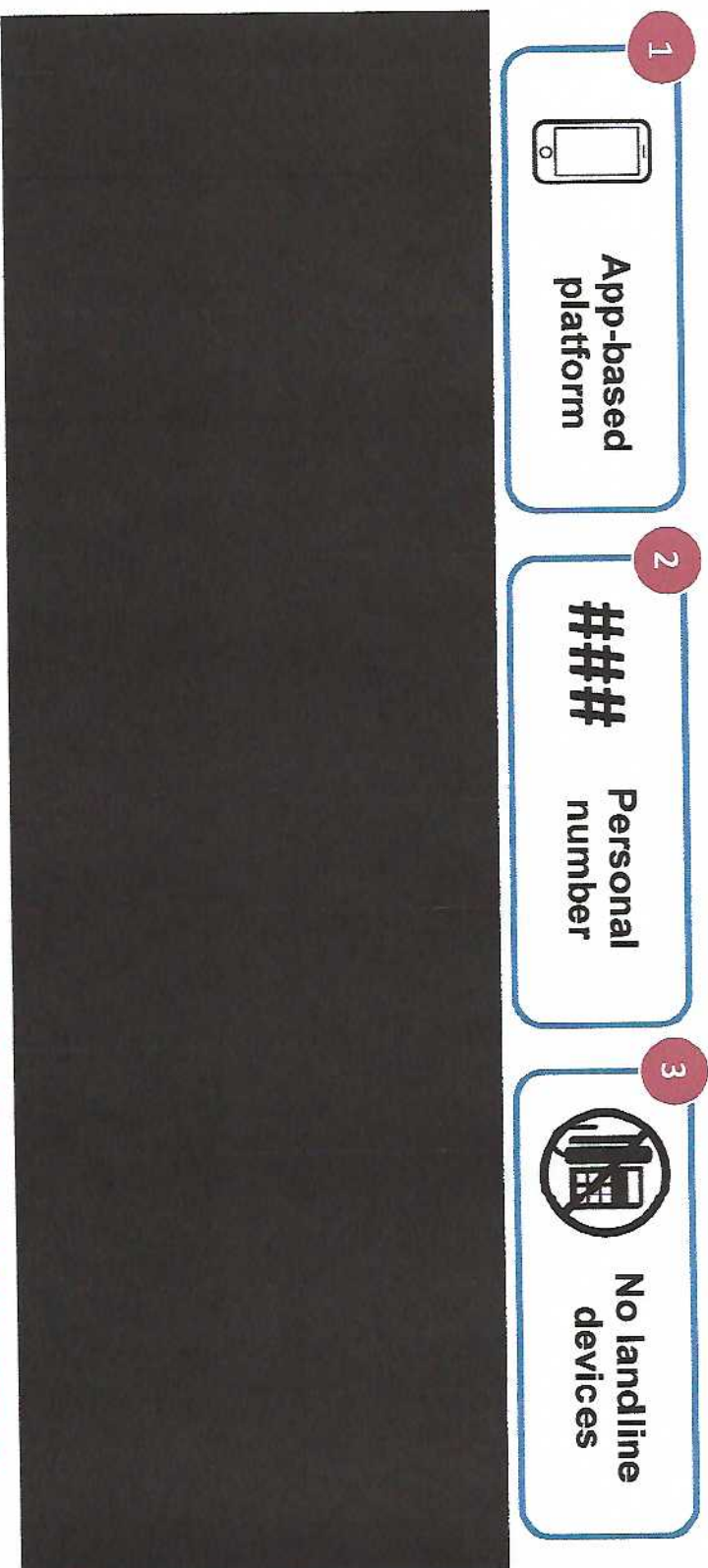
 

Note: Service offerings as of April 22, 2019
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Unique Advantages

InnoCaption's unique focus on its mobile-only communication service provides benefits for users, reduces compliance risks, and contributes to the long-term sustainability of the TRS Fund



Users



Compliance



Funding

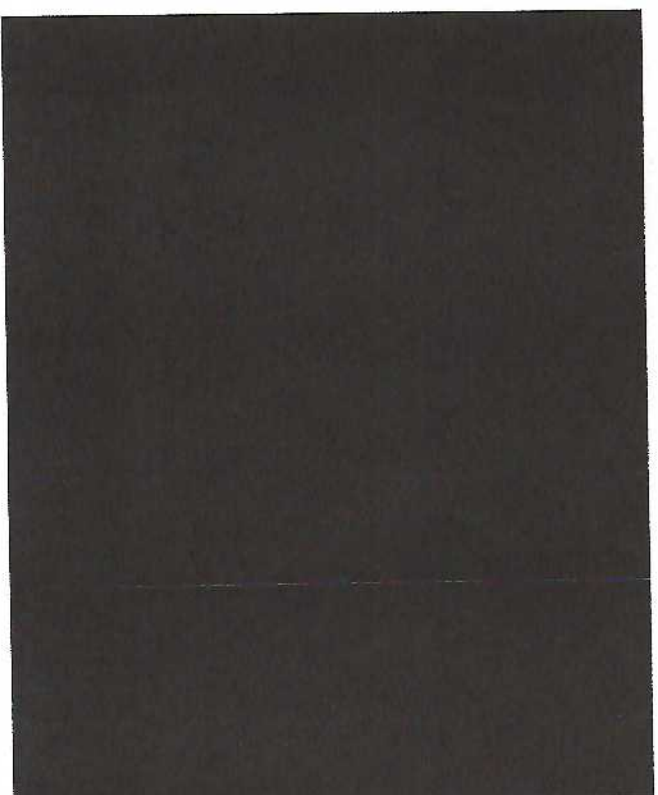
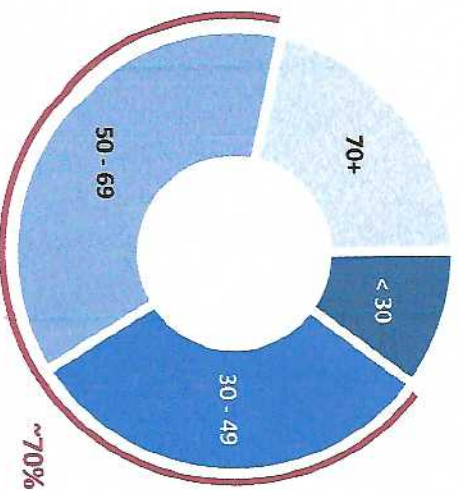
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Our User Profile

InnoCaption is a powerful enabler for a largely working age, technologically savvy user base

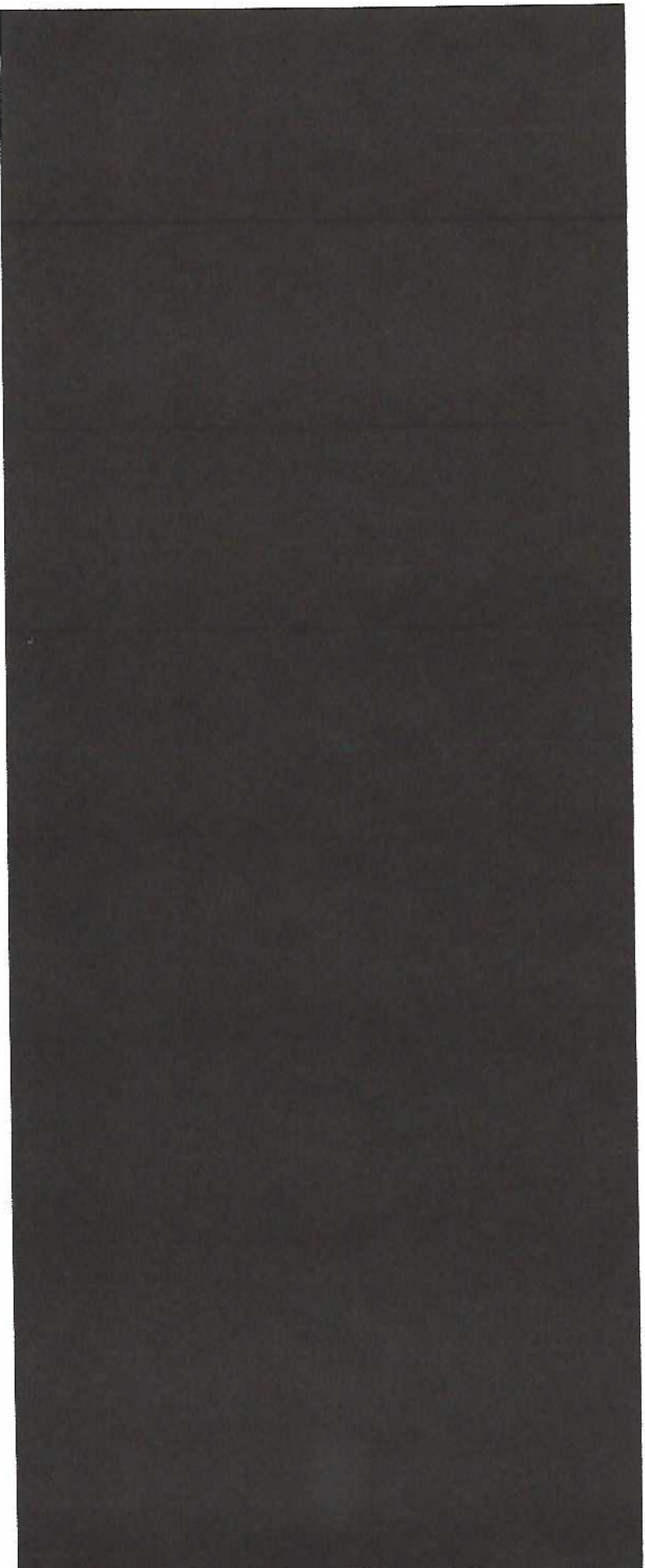
Users by Age Group



Source: Company user data as of December 2018, InnoCaption User Survey completed in December 2018
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Who are InnoCaption users?

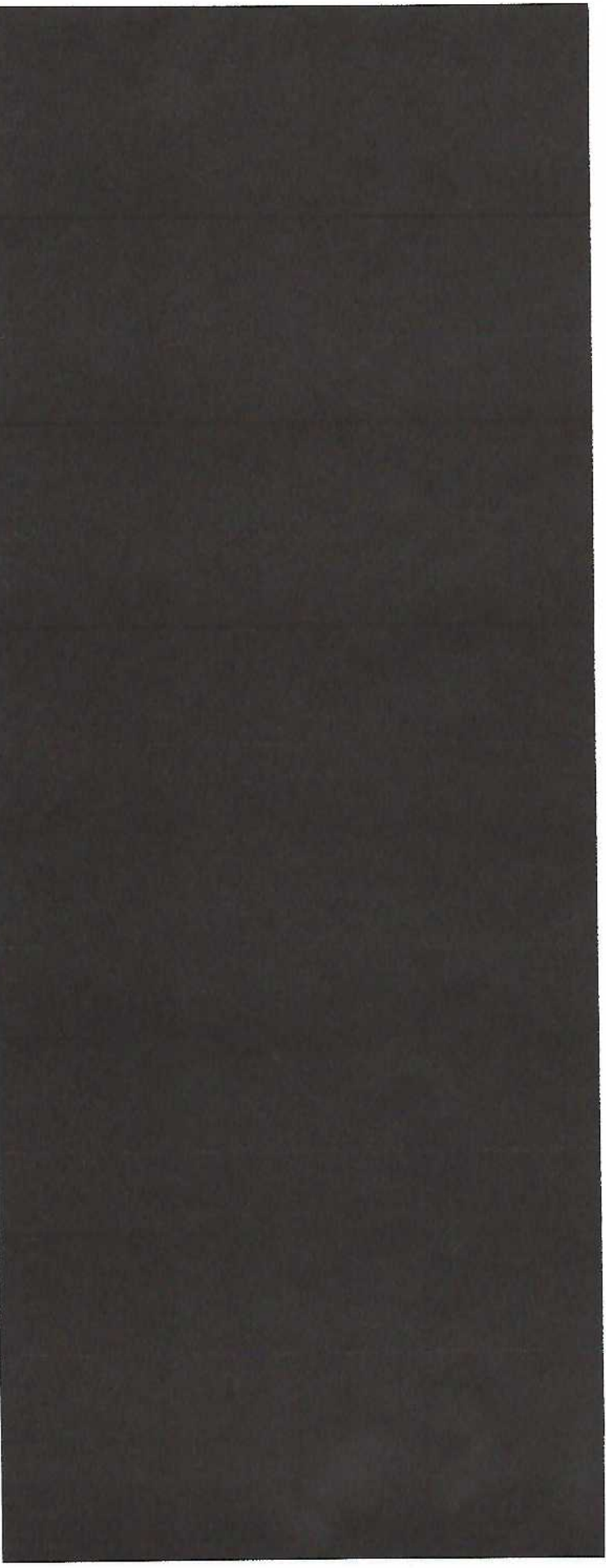


Source: InnoCaption User Survey completed in December 2018
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Traction to Date

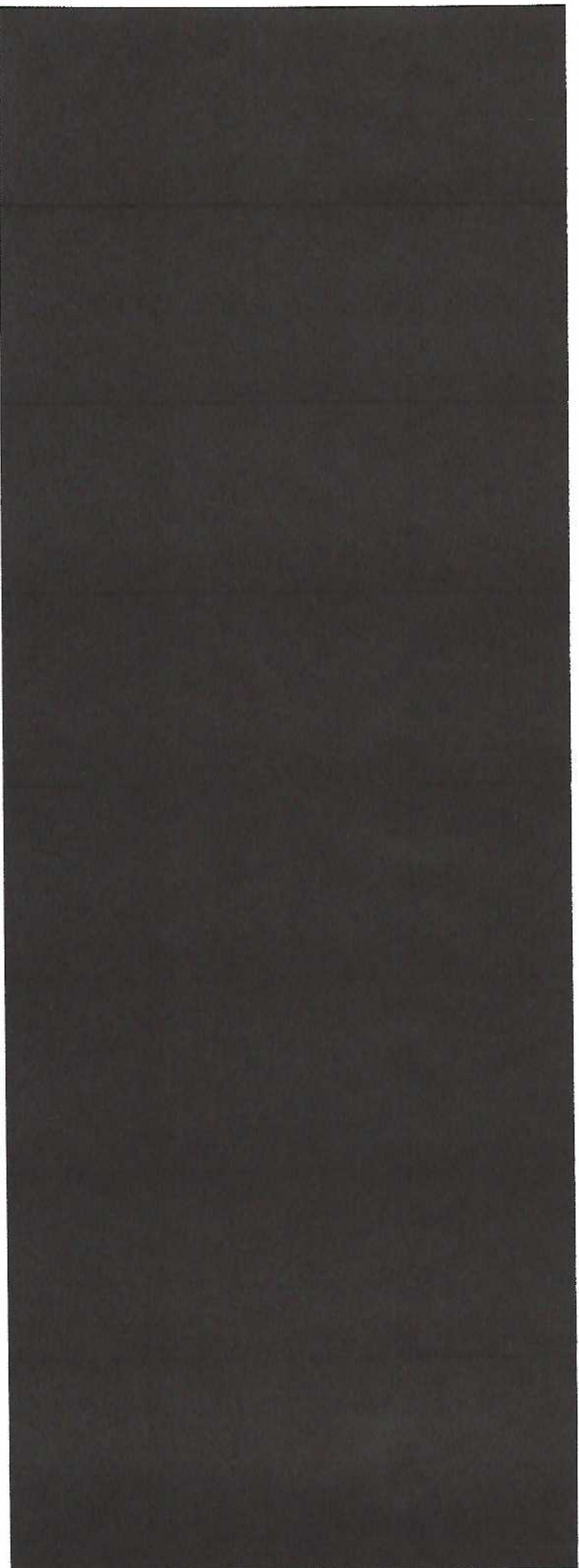
We have come a long way since 2016 and our steady growth in call volumes and positive feedback from users demonstrates the value and quality of our service



Source: Company data as of February 2019, InnoCaption User Survey completed in December 2018
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Immediate Investment Need

Now that we have proven the viability of our business model and are seeing rapid growth in call volumes, we must invest in our team and technology in order to continue supporting our users

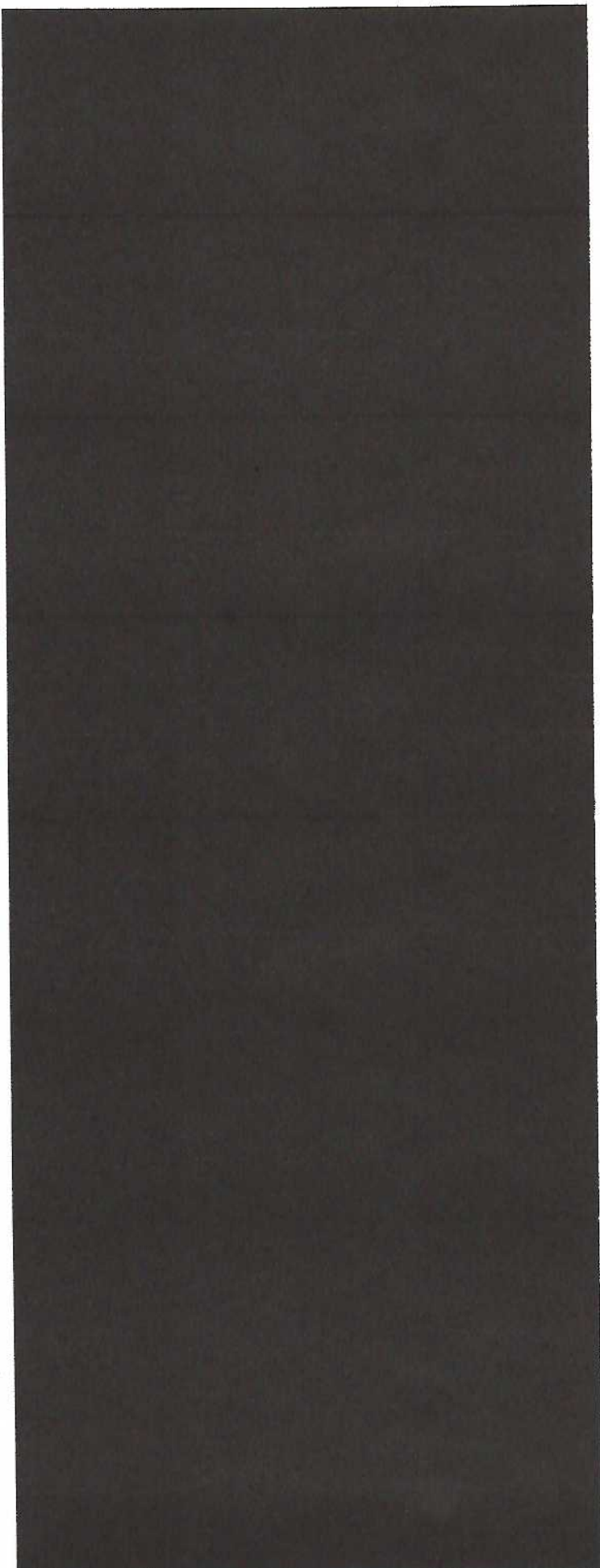


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Impact of IP-CTS Rate Cuts

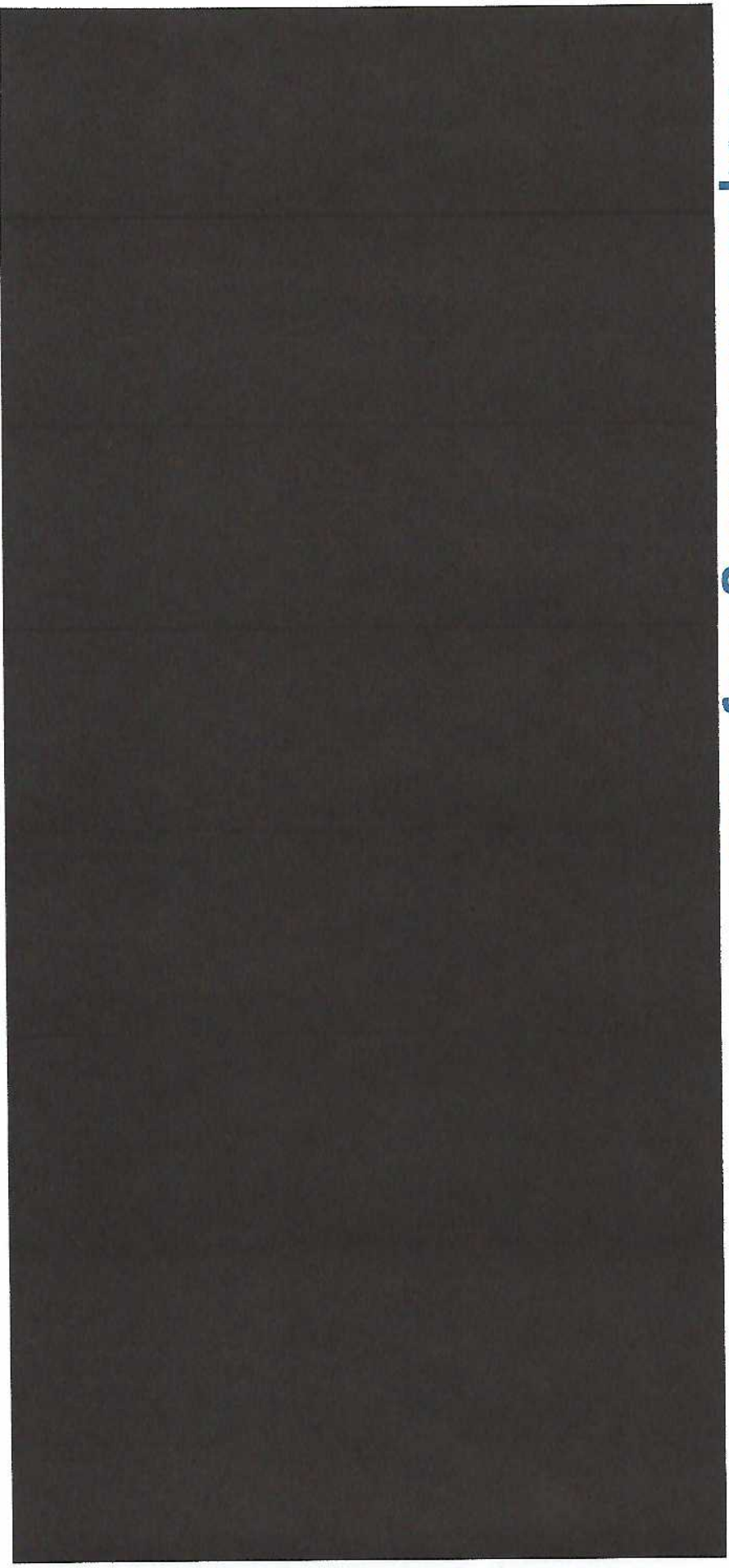
Despite our rapid growth and efficiency gains, the unexpected cuts to IP-CTS rates make it extremely difficult for us to stabilize our organization and invest for the future



1. Fully loaded cost represents planned cost structure under a reasonable business plan and 10% margin (actual costs were lower due to below market salaries for staff and delayed hires)

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Request for Emergency Rate Freeze



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Conclusion

- InnoCaption is a leader in the IP-CTS industry with regards to mobile technology and offers users a unique and modern accessibility solution

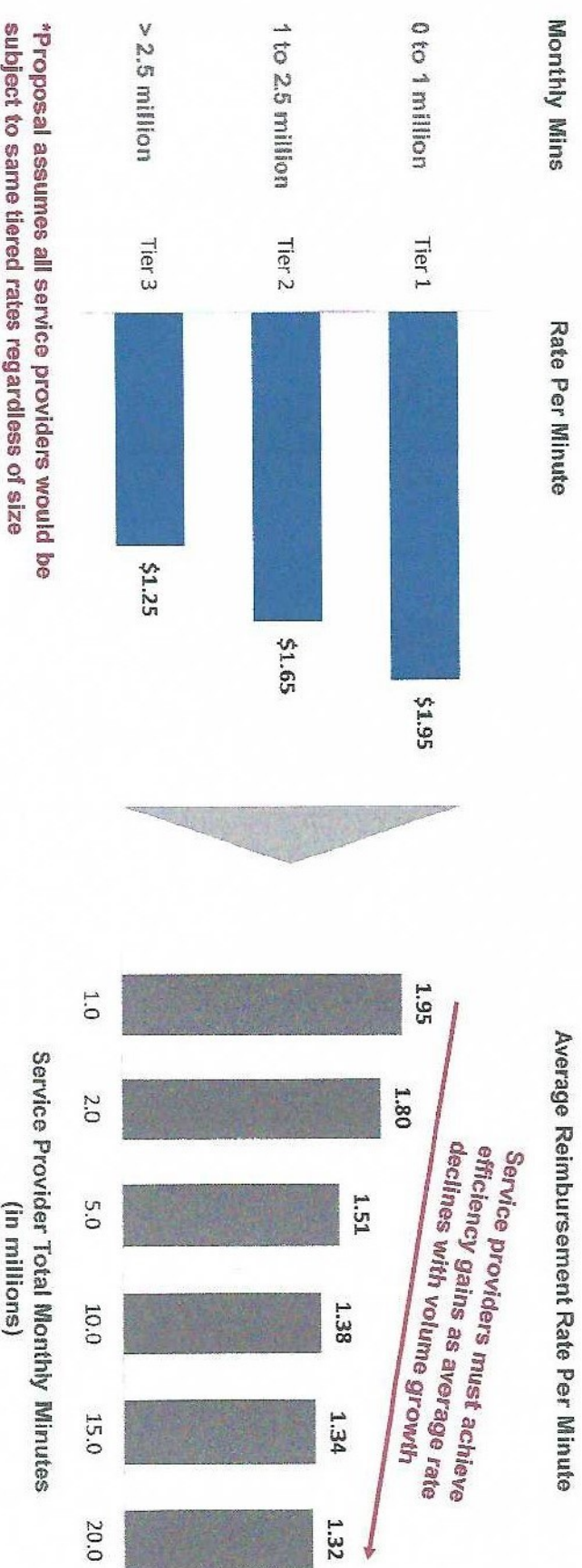
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Appendix – Proposed Tiered Rates

A tiered rate structure (similar to VRS rates) would allow smaller, innovative players to quickly scale and build out basic infrastructure, while investing for long-term efficiency gains. We have developed our own cost curve projection to form the basis of the following proposed tiered rate structure





Thank you!

For any questions regarding this presentation, please contact:

Cristina Duarte

Director of Regulatory Affairs

cristinaduarte@innocaption.com

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